

EXHIBIT “K”

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

Vantage Financial Services, Inc.

Plaintiff

v.

CIVIL ACTION NO. 04-11686-WGY

Nonprofit Service Group, Inc. and George E.
Miller

Defendants

**DEFENDANTS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF**

Pursuant to Fed. R. Civ. P. 34 and Local Rules 26.1, 26.5 and 34.1, Defendants Nonprofit Service Group, Inc., and George E. Miller request that Plaintiff Vantage Financial Services, Inc., produce the following documents within thirty (30) days of the date of service of this Request at the offices of Peabody & Arnold, LLP, 30 Rowes Wharf, Boston, MA.

DEFINITIONS

The following definitions are an integral part of each document request:

1. The Plaintiff is referred to Local Rule 26.5 (Uniform Definitions in Discovery Requests).
2. "Plaintiff" refers to Vantage Financial Services, Inc.
3. "Defendants" refers to Nonprofit Service Group, Inc. and George E. Miller.
4. Any reference to a party, person or entity shall mean the named party, person or entity, its or their agents, servants, employees, subsidiaries, affiliated companies or entities, predecessors, successors, officers, directors, members, attorneys and any other person or entity acting on behalf of said party, person or entity.
6. "The underlying action" refers to the United States District Court action entitled United States v. Henry Lewis, et al, Civil Action No. 97-CV-10052MLW

REQUESTS FOR PRODUCTION

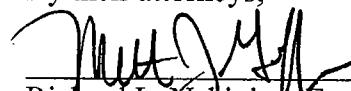
Request No. 1:

All bills for legal services received by the plaintiff concerning the underlying action, including, but not limited to, bills for legal services rendered by Laurence Johnson, Morris Goldings, Brian LeClair, Seth Perlman, Davis, Malm & D'Agostine and Perlman & Perlman.

Request No. 2:

All documents concerning all defense costs referred to in Paragraph (C)(2) of Plaintiff's Initial Disclosures

Nonprofit Service Group and
George E. Miller,
By their attorneys,


Richard L. Nakigian, Esq., BBO#: 549096
Matthew J. Griffin, Esq., BBO#641720
PEABODY & ARNOLD LLP
30 Rowes Wharf, 6th Floor
Boston, MA 02110-3342
(617) 951-2100

CERTIFICATE OF SERVICE

I, Matthew J. Griffin, hereby certify that I, this 1st day of February 2005, served by first class mail, postage prepaid, a copy of the foregoing document upon the following counsel of record:

Laurence M. Johnson, Esquire
Davis Malm & D'Agostine, P.C.
One Boston Place
Boston, MA 02108


Matthew J. Griffin

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